

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
CHICAGO DIVISION**

UNITED STATES OF AMERICA

vs.

Case No: 1:07-cv-6321

Judge Wayne R. Andersen

ANGEL FIGUEROA

_____/

**ANGEL FIGUEROA'S THIRD MOTION FOR
EXTENSION OF TIME TO FILE REPLY TO GOVERNMENT'S
RESPONSE TO MOTION FILED UNDER 28 U.S.C. § 2255**

COMES now, the Petitioner, ANGEL FIGUEROA, by and through his undersigned counsel, and moves this Honorable Court for a third extension of time of to file his reply to the government's response to his motion filed under 28 U.S.C. § 2255. In support of said motion, petitioner states as follows:

Undersigned counsel received a letter dated February 29, 2008 from Assistant United States Attorney Renato Mariotti indicating that he had found copies of the First Motion to Extend Time to File Indictment and of the Chief Judge's Order granting the motion, a copy of his letter is attached to this motion as Exhibit A.

On March 7, 2008 Assistant United States Attorney Dave Weisman left a message for undersigned counsel indicating that AUSA Mariotti would be out of the

office for a few days but that the U.S. Attorney's Office was going to be seeking permission from the District Court to have the Grand Jury information requested unsealed for counsel's use.

Counsel is requesting at this time another extension of time to permit the prosecutor to obtain the unsealing of the first motion to extend speedy trial and first order extending speedy trial and for additional time after receiving the documents in order to file his reply to the government's response to his motion filed under 28 U.S.C. § 2255.

WHEREFORE, the petitioner, ANGEL FIGUEROA, respectfully requests that this Honorable Court grant this third motion and extend the time for filing his reply to the government's response to his motion filed under 28 U.S.C. § 2255 in order to permit the prosecutor to obtain the unsealing of the first motion to extend speedy trial and first order extending speedy trial and for at least an additional 15 days after the court enters an order in response to the Government's motion to unseal to file his reply to the government's response to the motion filed under 28 U.S.C. § 2255.

Respectfully submitted,

THE LAW OFFICE OF
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s/William Mallory Kent
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing notice was served on Renato Mariotti, Office of the United States Attorney, 219 South Dearborn Street, Suite 500, Chicago, Illinois, 60604 and Scott Frankel, 77 W. Washington Street, Suite 1720, Chicago, Illinois, 60602 this the 11th day of March 2008.

s/William Mallory Kent

William Mallory Kent